

EXHIBIT 2

Michael T. Berger

From: Sheila Bodenbach
Sent: Monday, November 25, 2024 12:59 PM
To: Michael T. Berger; Nanette Cortese
Cc: Edward Ross
Subject: RE: Ross v City of Troy, Defendant discovery request
Attachments: Def First Discovery Req.docx

Attached is our discovery in Word format.



Sheila Bodenbach
Assistant to Michael Berger,
Elizabeth Kudla Saarela
and Debra Walling
27555 Executive Drive, Suite 250
Farmington Hills, MI 48331
P 248.489.4100 | F 248.489.1726
Email: sbodenbach@rsjalaw.com
Website: rsjalaw.com

The information contained in this communication is intended for the use of the recipient named above and contains confidential and legally-privileged information. If the reader of this communication is not the intended recipient, do not read, copy, disseminate or distribute it. You are hereby notified that any dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender and delete the original message and any copy of it from your computer system. If you need any additional information, please contact the sender at 248.489.4100. Thank you.

From: Michael T. Berger <mberger@rsjalaw.com>
Sent: Monday, November 25, 2024 12:56 PM
To: Nanette Cortese <ncortese@thecorteselawfirm.com>; Sheila Bodenbach <sbodenbach@rsjalaw.com>
Cc: Edward Ross <epross@acrocat.com>
Subject: RE: Ross v City of Troy, Defendant discovery request

Yes, you can have a 14 day extension. Sheila can get you the word doc.



Michael T. Berger
27555 Executive Drive, Suite 250
Farmington Hills, MI 48331
P 248.489.4100 | F 248.489.1726
Email: mberger@rsjalaw.com
Website: rsjalaw.com

The information contained in this communication is intended for the use of the recipient named above and contains confidential and legally-privileged information. If the reader of this communication is not the intended recipient, do not read, copy, disseminate or distribute it. You are hereby notified that any dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender and delete the original message and any copy of it from your computer system. If you need any additional information, please contact the sender at 248.489.4100. Thank you.

From: Nanette Cortese <ncortese@thecorteselawfirm.com>
Sent: Monday, November 25, 2024 12:33 PM
To: Sheila Bodenbach <sbodenbach@rsjalaw.com>
Cc: Michael T. Berger <mberger@rsjalaw.com>; Nanette Cortese <ncortese@thecorteselawfirm.com>; Edward Ross <epross@acrocatt.com>
Subject: RE: Ross v City of Troy, Defendant discovery request

Michael

I see that Defendants have sent discovery requests. Can you send them in Word and, in light of the holidays, may we have a 14 day extension to answer? Thank you.

From: Sheila Bodenbach <sbodenbach@rsjalaw.com>
Sent: Monday, November 18, 2024 1:35 PM
To: Nanette Cortese <ncortese@thecorteselawfirm.com>
Cc: Michael T. Berger <mberger@rsjalaw.com>
Subject: RE: Ross v City of Troy, Ed Ross Initial Disclosures

Ms. Cortese,

I'm just following up on this. Do you have the documents ready and can forward them to us?

Thank you,
Sheila

From: Nanette Cortese <ncortese@thecorteselawfirm.com>
Sent: Thursday, October 31, 2024 5:36 PM
To: Sheila Bodenbach <sbodenbach@rsjalaw.com>
Cc: Michael T. Berger <mberger@rsjalaw.com>
Subject: RE: Ross v City of Troy, Ed Ross Initial Disclosures

Michael

I am enclosing Ed Ross initial disclosures. We are working on compiling the documents, and will forward them as soon as they are compiled.

From: Sheila Bodenbach <sbodenbach@rsjalaw.com>
Sent: Wednesday, October 30, 2024 9:04 AM
To: Nanette Cortese <ncortese@thecorteselawfirm.com>
Cc: Michael T. Berger <mberger@rsjalaw.com>
Subject: RE: Ross v City of Troy, discovery via email

Ms. Cortese,

Pursuant to agreement, enclosed please find Defendants' Initial Disclosures and Defendants' First Discovery Requests relative to the above matter.

Thank you,



Sheila Bodenbach

Assistant to Michael Berger,
Elizabeth Kudla Saarela
and Debra Walling
27555 Executive Drive, Suite 250
Farmington Hills, MI 48331
P 248.489.4100 | F 248.489.1726
Email: sbodenbach@rsjalaw.com
Website: rsjalaw.com

The information contained in this communication is intended for the use of the recipient named above and contains confidential and legally-privileged information. If the reader of this communication is not the intended recipient, do not read, copy, disseminate or distribute it. You are hereby notified that any dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender and delete the original message and any copy of it from your computer system. If you need any additional information, please contact the sender at 248.489.4100. Thank you.

From: Nanette Cortese <ncortese@thecorteselawfirm.com>
Sent: Tuesday, October 29, 2024 5:19 PM
To: Sheila Bodenbach <sbodenbach@rsjalaw.com>
Cc: Michael T. Berger <mberger@rsjalaw.com>; Nanette Cortese <ncortese@thecorteselawfirm.com>
Subject: Re: Ross v City of Troy, discovery via email

Sheila we are agreeable to email exchange. I am in the process of finalizing ours and you should have them tomorrow.

Get [Outlook for iOS](#)

From: Sheila Bodenbach <sbodenbach@rsjalaw.com>
Sent: Tuesday, October 29, 2024 3:27:18 PM
To: Nanette Cortese <ncortese@thecorteselawfirm.com>
Cc: Michael T. Berger <mberger@rsjalaw.com>
Subject: Ross v City of Troy, et al

Ms. Cortese,

We are ready to serve our Initial Disclosures and First Discovery Requests in this matter. Are you in agreement to exchanging all discovery between the parties via email, which would be our preference. Or would you prefer service of paper copies via U.S. Mail?

Please advise.



Sheila Bodenbach

Assistant to Michael Berger,
Elizabeth Kudla Saarela
and Debra Walling
27555 Executive Drive, Suite 250
Farmington Hills, MI 48331
P 248.489.4100 | F 248.489.1726
Email: sbodenbach@rsjalaw.com
Website: rsjalaw.com

The information contained in this communication is intended for the use of the recipient named above and contains confidential and legally-privileged information. If the reader of this communication is not the intended recipient, do not read, copy, disseminate or

distribute it. You are hereby notified that any dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender and delete the original message and any copy of it from your computer system. If you need any additional information, please contact the sender at 248.489.4100. Thank you.